

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE
BENCHMARK RATES ANTITRUST
LITIGATION

No. 13 Civ. 7789 (LGS)

**AMENDED STIPULATION AND
[PROPOSED] ORDER**

WHEREAS, on October 3, 2022, the Court entered a Stipulation and Order regarding Plaintiffs' ability to use trial time to present Fifth Amendment testimony (ECF No. 1947);

WHEREAS, that Stipulation and Order set forth a paragraph to be read to the jury at the conclusion of the testimony of Daniel Wise, Mitesh Parikh, Edward Pinto, Rohan Ramchandani, and Joseph Landes summarizing the Fifth Amendment invocation by 21 additional FX traders (*Id.*, ¶8);

WHEREAS, counsel for one of those 21 FX traders objected to the accuracy of the summary paragraph previously stipulated to by the Parties only as applied to him;

WHEREAS, the Parties have met and conferred in good faith to attempt to resolve the objection;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Parties, as follows:

FIFTH AMENDMENT TESTIMONY

1. At the conclusion of the testimony of Daniel Wise, Mitesh Parikh, Edward Pinto, Rohan Ramchandani, and Joseph Landes, the Parties agree that Plaintiffs may read the following paragraph to the jury:

The following 21 FX traders asserted their Fifth Amendment rights under the United States Constitution and refused to testify about FX trading conduct during the Class Period, including multibank chats involving FX traders from competitor banks where bid-ask spreads were discussed.

Plaintiffs will then read the names the 21 traders (identified on Attachment A) and the bank or banks at which they worked during the Class Period.

2. All other aspects of the original stipulation in ECF No. 1947 continue to apply.

Dated: October 10, 2022

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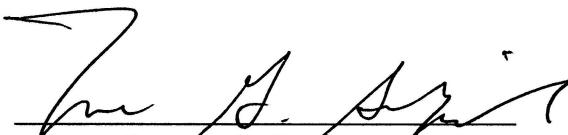
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DATED: October 12, 2022

SO ORDERED:



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

ATTACHMENT A

Trader	Bank(s) during Class Period
Akshay Aiyer	JPMorgan
Carly McWilliams Hosler	Citigroup
Christopher Ashton	Barclays
Clark Read	Credit Suisse, Barclays
David Bowen	Goldman Sachs
Eduardo Hargreaves	Standard Chartered
Frank Cahill	Barclays, HSBC, Goldman Sachs
James Mullaney	Standard Chartered
James Wynne	RBS
John Erratt	Credit Suisse, Barclays
Julian Munson	RBS
Luxshan Thiagarajah	JPMorgan
Mark Clark	Citigroup, Barclays
Michael Keogh	Deutsche Bank, Standard Chartered
Michael Weston	Royal Bank of Canada, Barclays
Niall O'Riordan	UBS
Paul Nash	RBS
Richard Usher	RBS, JPMorgan
Roger Boehler	UBS
Russell Katz	Barclays